

COMMENTS BY REDCOM LABORATORIES

(b) Station Number Identification signaling. The station number identification (SNI) code assigned to the emergency response location of a 911 caller will be sent from the registered equipment to the telephone company 911 system using multifrequency (MF) pulses, prompted by a solid off-hook indication from the telephone network.

Again, this is an attempt to require PBX owners, at great expense, to meet a trunk-side public network with today's signalling requirements. This network is rapidly changing. PBX's have DTMF signalling capability standard; the public network already can receive these digits on the line OR trunk side. Additionally, this section must address the newer access means, such as ATM packet switches. The Commission should recognize that the network evolution is well under way and that governmental services such as 911 centers (PSAP's) must accommodate interconnection to competing local access providers, including traditional telcos, cable companies, cellular and PCS providers, ATM and other packet voice or data (TDD) network providers. The Commission must take into account the necessary confidentiality of the customer databases of these providers by providing rules to allow for independent 911 databases and interface protocols.

(c) Operability. It shall be possible to access the Enhanced 911 trunk in emergencies whether or not system features are used that block access to normal dial trunks (i.e., restriction of all calls beginning with "9"). Access shall be provided whether users dial 911 or additional digits preceding 911.

This section does not allow for special dialing plans; too restrictive. Suffice to say that local 911 access be provided, unless necessary to restrict such as in special government facilities. The station instrument must have a sticker with the number sequence displayed. The way this reads now, a user dialing 9+429-0911 to reach a residence would be routed to the 911 center.

(d) Equipment levels. The minimum number of Enhanced 911 emergency services trunks connecting a private switch to the telephone network shall be one (1). Additional trunks may be used at the user's option. Additional trunks shall be added to maintain an availability of $P = 0.01$ based on the number of users served.

This allow for a non-redundant path which may never be used and therefore not tested frequently. Who is going to do that and to whom?. Better to allow End-office line side DTMF connection where the connections get tested every day. Most PBX's have the capability to test and by-pass "bad" trunks in the route selection process. Perhaps the PBX DOD trunk route process would hunt trunks in a circular hunt fashion, always reserving an adequate number of trunks to maintain P.01 grade of access service. In this fashion, the PBX would test the trunks daily, yet have the capacity to immediately process an emergency 911 call.

The requirement to add "trunks" based on the number of users served creates an undue burden on the PBX owner and the public network provider. It would be better to establish a table of reasonable "trunk" quantities based on the number of stations served. This table would be based on empirical data for the type of occupancy or PBX use. The data might include the expected number of simultaneous different emergency events expected, the average 911 call holding times, the probability of multiple callers reporting the same event, etc.

(e) Attendant Notification. Equipment manufactured or imported after [insert date: one year after the effective date of the order adopting rules in this proceeding], or installed after [insert date: 18 months after the effective date of the order adopting rules in this proceeding], must be capable of notifying an attendant or on-premises personnel, if present, and of providing station number identification and emergency response location to the attendant when a 911 call is dialed.

Again, this is overly restrictive. Adjunct equipment should be allowed. The requirement need is to get the information to the attendant and response personnel. Why should that be a function solely of the PBX? After-market devices can accommodate this need, thus saving the owner the cost of replacing the PBX.

COMMENTS BY REDCOM LABORATORIES

(f) Information Requirements. Equipment manufactured or imported after [insert date: one year after the effective date of the order adopting rules in this proceeding], or installed after [insert date: 18 months after the effective date of the order adopting rules in this proceeding], must have the capability to provide the caller's station number identification, caller location identification, and call back number to PSAP personnel,

Again, this is overly restrictive. Adjunct equipment should be allowed. The requirement need is to get the information to the attendant and response personnel. Why should that be a function solely of the PBX? After-market devices can accommodate this need, thus saving the owner the cost of replacing the PBX.

(g) labeling Requirements. PBX and dispersed telephone systems manufactured or imported one year from the effective date of §68.320 shall comply with this section. Equipment of earlier manufacture shall comply with the subsection if installed [insert date: eighteen months from the effective date of the section] or any time thereafter. Such equipment must be reregistered by the manufacturer or other person responsible for equipment compliance with Part 68, if already registered but not compliant with §68.320. Dispersed private telephone systems and associated station equipment that are domestically manufactured or imported on or after [insert date: 30 days, but not later than one year, from the effective date of the order adopting rules in this proceeding] that does not comply with §68.320 must be labeled by the manufacturer with a warning describing its limitations for those attempting to use it to call Enhanced 911. The warning must appear on the devices and on the outside of the packaging in which it is marketed. The domestic manufacture or importation of dispersed private telephone system equipment that does not comply with §68.320 must cease as of one year from the effective date of §68.320.

This entire labeling section must not be implemented as written. It is far too broad, restrictive and anti-competitive; particularly the last sentence. By this definition, PBXs manufactured here for overseas use would be prohibited unless they had a costly 911 capability useless to foreign users. This section also does not take into account the many special types of systems manufactured in the USA for government and special private network use.

SUMMARY COMMENTS:

This entire proposed rule indicates a lack of awareness of the technology changes and competitive forces being introduced into the "telephone" market today. Direct local loop dial tone competition exists now. The technical portion so penalizes PBX and private network owners that it could be used as an advertisement for Centrex. Existing PBX would be obsoleted in 18 months, new PBX's would be more costly and scarce, existing second-hand markets would dry up, etc. The language is so broad and all encompassing as to include almost anything that can provide communications. It then proceeds to restrict the "dispersed private telephone system equipment" from manufacture or import, without any clue as to its intended use. The Commission should seek to limit such language and concentrate instead on specifying "service interconnection standards for emergency service access" and let the manufacturers, buyers and owners determine what method best suits them to comply. The rules must also accommodate the private emergency response communications centers where 911 calls are today directed because of special needs. Some examples are chemical companies, Eastman Kodak, and the World Trade Center.

The rule should abolish any reference to "telephone companies" as they, for all practical purposes, no longer exist. The former "public network" is no longer a real entity now that both long distance and local dial tone service are available from private companies. Are they "private telephone systems" or are they "local public carriers" in the meaning of this rule? What are the boundaries of physical network connections relative to existing and new networks? Who owns the customer databases by which ALI is derived? What government body creates and regulates the inevitable "third party" database broker who keeps competitive databases

COMMENTS BY REDCOM LABORATORIES

separate? Who pays for it- every user via surcharge? There is much more to be considered for this rule than it's current content.

The former Independent Rochester Telephone is now frontier communications. There is still the old "telephone company" who provides tariffed telephone service. However, not only did the former RTC form a subsidiary to broker it's own and other carriers services, AT&T, Greater Rochester Cablevision (Time Warner) , MFS, ACC and others now also provide (or soon will be) local dial tone. All of them are competitors. Who their customers are is highly prized competitive information. No person in one company can be allowed access to another's database. Currently, the only PSAP trunking available is from Rochester Telephone (the network company) . All others must currently tandem through RTC to reach the 911 PSAP. The ALI information is lost because the call came from a competing network. The competing companies are being assigned their own NNX's, which means next door neighbors can have different NNX's, and be serviced by completely separate physical facilities; one has ALI information, the other not. This is also a city with separate private and public 911 communications centers (Greater metropolitan Rochester and Eastman Kodak). Kodak has it's own police, fire, medical and Haz-Mat response. All 911 calls from the main campus of dozens of buildings are handled directly by the private 911 center.

This proposed rule must address these issues. This rule has such far-reaching impact on network providers, premise equipment providers, and traditional PSAP access route philosophies that the proceeding should be expanded in the following manor:

- a. Compile the response issues.
- b. Make a general mailing announcement of the issue topics to manufacturers, existing service providers, potential service providers, Cellular and PCS operators, and other interested parties.
- c. After notification of potential interested parties, hold forums in various areas of the country, particularly Rochester, NY and Ameritech territories, where competition in the local loop is in progress or imminent.
- d. Re-draft the proposed rule to specify 911 service interfaces (voice, voice/data and data only) and drop the "how you must fit the existing network environment" theme, because it's going to be phased out by competition. If the existing telephone companies want to specify how THEIR networks may be interfaced to accommodate existing technology, so be it. However, don't specify that's the way it MUST be done; give the subscriber the choice. There's equipment out in the marketplace that can provide in-band or message based ALI on older PBX's. Require the 911 center to provide connection to any carrier willing to interconnect. Perhaps there should be a dedicated front-end tandem at the 911 center which provides the carrier switching access. This location could be independently run and have the complete ALI database, partitioned as required with subscribing carriers maintaining their own portion of the database. Even second tier "bureaus" could be utilized to provide this service to smaller carriers or dedicated end users. Look at the possibilities; perhaps the existing carrier is unwilling to make low-cost DTMF line-side PBX 911 access available, and the competitive carrier can and does. The PBX owner could swing his DOD trunks over to the alternate carrier. The alternate carrier gets the local traffic, the long distance traffic, volume discount benefits and more. The existing carrier is provided incentive to upgrade its network to meet the market demand. The user gets lower cost interconnection. The Commissions role is to specify the minimum reasonable information to be provided to the 911 center, based on the technology used for the conveyance. Certain requirements for information can be phased in (over a longer period than 18 months) to allow market forces to shape the technology to be used.
- e. Take advantage of new network features like "Crankback" and "911 priority" to help ensure call completion over various switching and transmission media. Temper the "911 priority" issue with the realities of shared spectrum usage during large emergencies. For example, during the Rochester (NY) Ice Storm of 91, tens of thousands of 911 calls went uncompleted because residents were using the 911 center to access city services not otherwise available. Hundreds of requests for "time" were handled. After repeated failed 911 call attempts, residents with real emergencies, such as house fires and heart

COMMENTS BY REDCOM LABORATORIES

attacks, were required to dial any emergency agency they could find in the phone book. As more and more agencies turn to 911 operation, they take their listings out of the phone book. The resident no longer has an alternative to dialing 911. To complicate matters, many police, fire and other agencies rely on cellular (and soon PCS) to handle their own activities. Any "911 Priority scheme" must address the fact that these users must also be at some priority level to gain and maintain access to the spectrum facility, otherwise the responding agencies could be hampered in their operations by futile re-attempts and blockage by non-emergency 911 calls. By identifying the potential problems with knowledge obtained in the forums and a broader spectrum of contributors, the Commission can better formulate the regulations which are needed to shape the desired objective; timely quality access and ALL information to the emergency service responders, regardless of the access method and transport used.

As a manufacturer of diverse and flexible switching systems for public, private, and government networks around the world, we are particularly concerned that regulations of this type address the needed public safety issues and are based on actual network interconnection needs, not overly restrictive generic and narrow hardware restriction approaches.